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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC

This document relates to:

ALL ACTIONS

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIALS
SHOULD BE SEALED**

CIVIL L.R. 7-11 and 79-5(f)

Judge: Hon. Vince Chhabria
Special Master Daniel Garrie
Courtroom: 4, 17th Floor

[PROPOSED] ORDER

Before the Court is Plaintiffs' Administrative Motion to Consider Whether Another Party's Materials Should be Sealed (the "Motion") and all supporting papers. Having considered the supporting declaration of the designating party, Facebook, Inc., and GOOD CAUSE APPEARING, the Court GRANTS Plaintiffs' Administrative Motion and ORDERS that the following documents remain filed under seal:

	Documents	Portions Sought to be Sealed	Evidence Offered in Support of Sealing
1	Full 30(b)(6) Deposition Transcript of Simon Cross (May 9, 2022)	26:15–21 29:8–14 43:18–23 50:10–16 56:13 56:16 56:20 56:24 57:16–21 60:7–16 62:15–63:3 74:6–11 76:3–11 77:10–78:20 78:22–79:3 80:5–81:3 81:19–82:1 93:13–18 94:9–19 95:10–25 96:10–21 96:24–97:1 100:5–9 113:18–21 116:18 117:4–6 117:10–16 117:19–118:8 118:15–18 119:9–12 120:18 126:8–12 128:9–15 128:25–129:1	Pursuant to the Stipulated Protective Order (Dkt. 122), Defendant designated portions as Confidential Information; Defendant to provide evidence, per Local Rule 79-5(f)

	Documents	Portions Sought to be Sealed	Evidence Offered in Support of Sealing
		129:17–130:11 130:18–20 131:2–9 132:4–9 132:16–25 136:5–7 170:9–10 170:13 170:16 170:20 174:15–21 177:8 183:9–15	
2	Full 30(b)(6) Deposition Transcript of Simon Cross (May 12, 2022)	224:22–225:21 225:24–226:22 237:20–24 238:3–239:10 246:15–25 247:13–20 249:7–20 249:25–250:1 250:5–8 252:11–21 253:6–7 254:15–18 255:2–6 255:24–256:1 266:11–20 268:2–3 268:20–24 269:2–6 270:1–3 273:5–8 273:14–16 274:19–275:4 277:8–19 281:23–282:8 296:13–15 296:19–21 296:25–297:13 300:23–301:16 302:1–3 303:6–11 303:23–304:6	Pursuant to the Stipulated Protective Order (Dkt. 122), Defendant designated portions as “Confidential” or “Highly Confidential—Attorneys’ Eyes Only” Information; Defendant to provide evidence, per Local Rule 79-5(f)

	Documents	Portions Sought to be Sealed	Evidence Offered in Support of Sealing
		305:15–18 305:23–306:6 308:22–24 310:6–14 312:8–9 314:17–21 315:3–6 315:12–16 315:21–25 318:4 319:20–24 322:8–11 329:1–5 333:9–19 334:16–23 338:6–11 338:25–339:2 339:10–12 342:8–14 343:13–15 344:17–24 353:5–13 355:5–15 357:4–13 358:3–13 358:24–359:4 360:16 365:25–366:2 369:7–15 369:18–19 370:12–14 Errata at entries 1, 2, 3, 4, 5, 6, 7.	
3	Full 30(b)(6) Deposition Transcript of Simon Cross (June 6, 2022)	545:20–548:13 550:13–17 558:21–560:9 560:23–567:5 568:2–569:9 570:4–573:1 573:9–574:3 576:15–577:21 579:16–580:16 583:1–12	Pursuant to the Stipulated Protective Order (Dkt. 122), Defendant designated portions as “Confidential” or “Highly Confidential—Attorneys’ Eyes Only” Information;

	Documents	Portions Sought to be Sealed	Evidence Offered in Support of Sealing
		584:11–24 585:21–586:15 586:23–587:10 587:15–588:5 588:22–23 589:1–590:18 590:20–591:3 601:23–602:8 604:1–605:24 606:7–609:21 609:24–610:2 611:1–612:1 616:18–618:13 619:5–15 620:16–621:16 622:9–626:7 627:11–632:3 637:14–638:11 639:22–640:12 642:6–644:4 645:20–653:10 653:24–657:6 657:21–659:6 660:11–19 661:5–11 663:3–25 664:18–666:15 666:20–667:3 667:9–23 668:16–19 670:2–671:24 672:23–676:11 676:15–678:1 678:13–680:11 680:18–681:24 683:6–684:8 685:3–14 687:17–688:23 689:7–691:4 691:5–12 692:2–23 695:17–23 697:7–699:10 700:1–19 701:1–704:13	Defendant to provide evidence, per Local Rule 79-5(f)

	Documents	Portions Sought to be Sealed	Evidence Offered in Support of Sealing
		709:4–13 710:25–714:18 716:1–718:18 Errata at entries 13, 14, 15, 19, 20, 22, 23.	
4	Full 30(b)(6) Deposition Transcript of Simon Cross (June 20, 2022)	748:14–16 748:25–749:8 752:13–23 754:24–756:4 787:24–791:7 792:3–19 793:10–799:20 834:14–836:17 841:13–845:10 846:5–848:6 850:5–866:23 869:8–870:5 871:14–873:1 873:17–883:17 884:19–886:10 887:4–23 888:2–897:19 905:1–25 909:20–911:25 914:4–916:4 943:1–945:7 946:24–964:14 965:17–980:20 Errata at entries 7, 10, 11, 12, 14, 16, 17, 18, 20, 21, 24, 25.	Pursuant to the Stipulated Protective Order (Dkt. 122), Defendant designated portions as “Confidential” or “Highly Confidential—Attorneys’ Eyes Only” Information; Defendant to provide evidence, per Local Rule 79-5(f)
5	Full 30(b)(6) Deposition Transcript of Simon Cross (June 21, 2022)	1000:3–1002:11 1002:16–1004:15 1004:19–1007:4 1007:11–18 1008:17–1028:24 1030:6–1040:13 1040:14–1046:8 1046:19–1074:23 1075:4–1096:25 1103:11–1106:25 1008:5–1110:22	Pursuant to the Stipulated Protective Order (Dkt. 122), Defendant designated portions as “Confidential” or “Highly Confidential—Attorneys’ Eyes Only” Information; Defendant to provide evidence, per Local Rule 79-5(f)

	Documents	Portions Sought to be Sealed	Evidence Offered in Support of Sealing
		1111:12–1114:9 1114:19–25 1116:14–1132:10 1132:15–1135:11 1135:24–1137:6 1147:14–1150:19 1152:4–1155:20 1158:5–24 1167:16–1169:18 1172:1–1174:1 1185:18–1193:8 1196:18–1197:10 1204:6–1205:9 1206:12–1207:4 Errata at entries 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 30, 31, 33.	
6	Full 30(b)(6) Deposition Transcript of David Miller (July 22, 2022)	33:14–24 34:1–35:9 35:11–35:21 36:4–37:10 37:12–38:1 38:4–39:1 41:8–15 42:23–25 47:23–49:23 55:19–56:5 60:12–17 63:18–64:13 68:25–69:2 69:5–9 69:12–19 69:21–70:2 70:18–25 72:20–73:2 73:17–21 75:24–76:8 81:3–9 81:17–25 88:25–89:23 113:20–24 114:23–118:4	Pursuant to the Stipulated Protective Order (Dkt. 122), Defendant designated portions as “Confidential” or “Highly Confidential—Attorneys’ Eyes Only” Information; Defendant to provide evidence, per Local Rule 79-5(f)

	Documents	Portions Sought to be Sealed	Evidence Offered in Support of Sealing
		Errata at entries 7, 10, 16, 17, 22.	
7	Full 30(b)(6) Deposition Transcript of Michael Fahey (July 21, 2022)	23:4, 22–25 24:1–8, 21–25 25:1–13 26:24–25 27:1–25 28:1–7 28:25 29:1–25 30:1–17 31:2–11, 18–19, 21–25 32:1–3, 5–7, 12–21, 25 33:1–5, 8, 10–25 34:1–4, 8–15, 17–21, 24–25 35:1–16, 18–25 36:1–7, 10–15, 19, 25 37:1–3, 11–15, 17–25 38:1–14, 26–22 39:4–6, 10–16 40:1–3 41:12–13, 16–17 46:2–25 47:1–6, 8–17, 20–25 48:1–10, 17–20, 22–25 49:1–2, 5–6, 12–14, 17–24 50:4–8, 15–24 51:1–2, 3–9, 11–20, 24 52:1–3, 9–10, 17, 19–21 53:2–4, 14 54:11, 14, 17–25 55:1–17 56:16–24 57:1–25 58:1–2, 5, 7–8, 10, 15–20 59:1–14, 16–17 60:1–4, 24–25 61:1–6, 18–25 62:1–11, 13–21, 23–25 63:1–4, 9–12 64:2–4, 6–17, 19–21, 23 65:2–7, 10–11, 21–25 66:1–10, 12–25	Pursuant to the Stipulated Protective Order (Dkt. 122), Defendant designated portions as “Confidential” or “Highly Confidential—Attorneys’ Eyes Only” Information; Defendant to provide evidence, per Local Rule 79-5(f)

	Documents	Portions Sought to be Sealed	Evidence Offered in Support of Sealing
		67:1, 3–5, 15–25 68:1–11, 21–22, 24–25 69:1–4, 9–15, 17, 20–25 70:1–5, 17–25 71:1–20, 23 72:1–4, 7–18, 73:3–14, 22–25 74:1–13, 15–16, 21–25 75:1–7, 10–19, 21–22, 24–25 76:1–4, 23–25 77:1, 4, 25 78:12–15 79:8–10, 12–13, 22–25 80:11–13, 18–25 81:3–6, 8–13, 16–22, 24 82:9–13, 16–24 83:1–5 84:25 85:1–2, 5–7, 9–21 86:1–9, 11–13, 16–25 87:1, 3–6, 8–16, 23–25 88:16–22 90:15–17, 20–25 91:1–8 93:15–22 97:11–17 98:1–2, 13–16, 19–25 99:1–3, 7–25 100:1–22 103:9–13, 15–25 Errata at entries 3, 4, 5, 6, 7, 8. Certain words on pages 4, 9, 10, 20, and 23 of the index.	

IT IS SO ORDERED.

Date: _____

VINCE CHHABRIA
United States District Judge